

Executed at Sherman Oaks, California on August 25, 2014.

I oppose plan confirmation because the **Debtors have failed to:**

☒ schedule debts within the limits of 11 USC §109(e); and therefore **ineligible**; and/or Debtors are not eligible to be Chapter 13 Debtors as follows:

- **Potentially exceeds unsecured debt limit, must list approximate claim amts. for Sch.F, cannot be "unknown"**
- **Amend to disclose amounts of all debt**

☒ **disclose** [11 USC §521, LBR 1017-1(b)]

☒ assets ☐ creditors ☐ income ☐ prior case

- **fmv of real property > scheduled**
- **\$486,000 vs. \$345,000 scheduled (\$102,120 non-exempt equity after \$84,794 exemption) - provide evidence FMV**

☐ **serve all** creditors with notice and the Plan at least 28 days before the 11 USC §341 (a) Meeting of Creditors, FRBPs 2002(b), 7004 and LBR 3015-1(b)(3);

☒ provide the Trustee **documentation of all income** (as well as any contributor's income) seven days before the §341(a) Meeting of Creditors. LBR 3015-1(c)(3), 11 USC § 521;

- **2012 tax return**
- **2013 tax return**
- **short form business report**
- **2013 year-to-date income/expense**
- **2014 year-to-date income/expense**
- **6 months bank statements**
- **decl of contribution w/evid income & where lives**

☒ meet the **business reporting requirements** regarding Debtors' business or self-employment, LBR 3015-1(c)(4);

- **short form business report**
- **2013 year-to-date income/expense**
- **2014 year-to-date income/expense**
- **6 months bank statements**

☒ provide to the Trustee completed copies of the Federal and State **income tax returns**, 11 USC § 1308 and 521, LBR 3015-1(c)(3).

- **2012 tax return**
- **2013 tax return**

☒ propose a plan that is feasible 11 USC § 1325(a)(6); the plan is **infeasible** because

☐ certain claims are not included and/or the amount provided is insufficient

☒ income is not sufficient enough to fund it

- **Deficit Budget**

☒ plan payment will not retire debt within term

- **Deficit Budget**

☒ the plan does not propose treatment and/or properly treat all scheduled, priority and/or secured creditors; and/or plan deficiencies as follows:

- **Plan is not feasible: Deficit budget**

☐ propose a plan that represents the Debtors' **best effort** 11 USC §1322; 11 USC §1325

- ☐ unreasonable and/or unnecessary expenses are scheduled
- ☐ the budget surplus exceeds the monthly plan payment
- ☐ comply with the Means Test as required by the Code, In re Kagenveama, 541 F3d 868, and/or In re Lanning, 1330 S.Ct.2464

☒ propose a plan that provides creditors as much as would be received under **Chapter 7**

11 USC §1325(a)(4).

- **ch7 would receive > %**

- **\$1,700 bank accts, \$5,768 Metlife Insurance, \$750 Ford F -350, \$3,363 GMC Yukon, \$9,350 Land Cruiser, \$6,500 Camaro, \$950 Chevelle, \$3,800 Chevelle not exempt**

☒ other issues as stated below:

- **Trustee to request interlineations that all tax returns be submitted to the Trustee; all tax refunds to be submitted into the plan and the Debtors will not incur debt greater than \$500 without Court permission.**

PROOF OF SERVICE

In Re: Michael Kingsley & Lauren Christine Ingram
Case No. ND14-11232-PC

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

Elizabeth Rojas
15060 Ventura Blvd.
Suite 240
Sherman Oaks, CA 91403

The foregoing document described as **TRUSTEE'S OBJECTION TO CONFIRMATION; NOTICE OF POSSIBLE DISMISSAL OR CONVERSION** will be served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner indicated below:

On August 25, 2014, I served the following person(s) and/or entity(ies) at the last known address(es) in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States Mail, first class, postage prepaid, addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Michael Kingsley Ingram
Lauren Christine Ingram
1226 Drake Drive
Simi Valley, CA 93065

Russ W Ercolani
Ercolani Law Group
4195 E Thousand Oaks Bl Ste 175
Westlake Village, CA 91362

Hon. Robin Riblet
1415 State Street, Courtroom #201
Santa Barbara, CA 93101-2511

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: August 25, 2014

/s/ Patricia Trujillo
